Mr. Harold Karp Essex Group, Inc. 3400 Union Street Lafayette, Indiana 47903

> Re: 157-15428-00034 Notice-only change to MSOP 157-14304-00034

Dear Mr. Karp:

Essex Group, Inc. was issued a permit on March 20, 2002 for a stationary wire and cable manufacturing facility. A letter notifying the Office of Air Quality of errors in the permit was received on April 2, 2002. Pursuant to the provisions of 326 IAC 2-6.1-6 the permit is hereby revised as follows:

- 1. Condition A.2(j) and condition D.2(j) in the permit referred to two (2) wire mills. This is a typographical error, the source has three (3) wire mills. The potential emissions for this source were calculated using three (3) wire mills. Rule applicability was also based on three wire mills. Conditions A.2(j) and D.2(j) in the permit have been corrected to "Three (3) wire mills."
- A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (j) Two (2) Three (3) wire mills;
- 2. Conditions D.2(g) and D.2(h) are incorrectly listed in the permit. The correct descriptions are listed in condition A.2(g) and A.2(h). The correction was inadvertently omitted in conditions D.2(g) and D.2(h). The potential emissions were calculated using the correct number of continuous vulcanization lines as stated in the Technical Support Document (TSD) and in conditions A.2(g) and A.2(h). Condition D.2(g) has been corrected in the permit to read, "Two (2) Continuous Vulcanization Catenary Lines, referred to as CV-1 and CV-2, each with a maximum capacity of 762 pounds of rubber per hour." Condition D.2(h) has been corrected in the permit to read, "Two (2) continuous vulcanization slope lines, referred to as CV-5 and CV-6, each with a maximum capacity of 762 pounds of rubber per hour."

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6]:

- (f) Four (4) Banbury mixers, one with a maximum capacity of 2,000 pounds of rubber per hour, and three others each with a maximum capacity of 2,500 pounds of rubber per hour, referred to as BB1 through BB4. The particulate matter emissions from these mixers are controlled by two baghouses;
- (g) Three (3) Two (2) Continuous Vulcanization Catenary Lines 1 (CV-CV-1), 2 (CV-CV2V), and 3 (CV-C3V), referred to as CV-1 and CV-2, each with a maximum capacity of 762 pounds of rubber per hour;
- (h) Six (6) Two (2) continuous vulcanization slope lines, referred to as CV-5 and CV-6, each with a maximum capacity of 762 pounds of rubber per hour;
- (i) One (1) rod mill;
- (j) Two (2) Three (3) wire mills;
- (k) One (1) compactor for crushing empty boxes and bags;
- (I) One (1) bag baler;
- (m) Four (4) parts washers;
- (n) One (1) finished goods warehouse;
- (o) Raw material storage areas;
- (p) Electronic beam facility;
- (q) Off-line packaging;
- (r) Waste accumulation area;
- (s) Pilot plant;
- (t) Wastewater evaporator;
- (u) Ancillary equipment;
- (v) Empty compound tanks; and
- (w) Process oil tanks.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Essex Group, Inc.
Page 3 of 3
Lafayette, Indiana
NOC 157-15428-00034

Permit Reviewer: ERG/AR

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Alicia Rivenbark, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7902 to speak directly to Ms. Rivenbark. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed by Paul Dubenetzky Paul Dubenetzky, Chief Permits Branch Office of Air Quality

Attachments

ERG/YC

cc: File - Tippecanoe County

U.S. EPA, Region V

Tippecanoe County Health Department

Air Compliance Section Inspector - Eric Courtright

Compliance Data Section - Karen Nowak
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

Essex Group, Inc. 3400 Union Street Lafayette, Indiana 47904

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 157-14304-00034	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 20, 2002 Expiration Date: March 20, 2007

First Notice-only Change 157-15428-00034	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 24, 2002

Notice-Only Change 157-15428-00034 Modified by: ERG/AR

Essex Group, Inc. Lafayette, Indiana Permit Reviewer: ERG/AR

Page 2 of 23 157-14304-00034

TABLE OF CONTENTS

A.1 A.2	SOURCE SUMMARY General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)] Emission Units and Pollution Control Equipment Summary
B.1 B.2 B.3 B.4 B.5	GENERAL CONDITIONS Permit No Defense [IC 13] Definitions Effective Date of the Permit [IC 13-15-5-3] Modification to Permit [326 IAC 2] Permit Term [326 IAC 2-6.1-7]
C.1 C.2 C.3 C.4 C.5 C.6 C.7	SOURCE OPERATION CONDITIONS PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21] Preventive Maintenance Plan [326 IAC 1-6-3] Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6] Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)] Permit Revocation [326 IAC 2-1-9] Opacity [326 IAC 5-1] Fugitive Dust Emissions [326 IAC 6-4]
Testing C.9 C.10 C.11 C.12	Performance Testing [326 IAC 3-6] Compliance Monitoring [326 IAC 2-1.1-11] Monitoring Methods [326 IAC 3] Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 1-6]
Record C.13 C.14 C.15 C.16 C.17	d Keeping and Reporting Requirements Malfunctions Report [326 IAC 1-6-2] Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-13] General Record Keeping Requirements [326 IAC 2-6.1-2] General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13] Annual Notification [326 IAC 2-6.1-5(a)(5)]
SECTION D.1	EMISSIONS UNIT OPERATION CONDITIONS

Emission Limitations and Standards

- D.1.1 Particulate Matter (PM) [326 IAC 6-2-3]
- D.1.2 Particulate Matter (PM) [326 IAC 6-2-4]
- D.1.3 Particulate Matter [40 CFR 60, Subpart Dc] [326 IAC 12]

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.4 General Provision Relating to NSPS [326 IAC 12-1][40 CFR 60, Subpart A]
- D.1.5 Record Keeping Requirements
- D.1.6 Reporting Requirements

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emission Limitations and Standards

- D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]
- D.2.2 Volatile Organic Compounds (VOC)
- D.2.3 Volatile Organic Compounds (VOC)

Notice-Only Change 157-15428-00034 Modified by: ERG/AR Page 3 of 23 157-14304-00034

TABLE OF CONTENTS (Continued)

Annual Report Natural Gas Fired Boiler Certification Malfunction Report Notice-Only Change 157-15428-00034 Modified by: ERG/AR

Essex Group, Inc. Lafayette, Indiana Permit Reviewer: ERG/AR Page 4 of 23 157-14304-00034

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary wire and cable manufacturing facility.

Authorized Individual: Harold Karp

Source Address: 3400 Union Street, Lafayette, Indiana 47903 Mailing Address: 3400 Union Street, Lafayette, Indiana 47903

Phone Number: (219) 461-4000 SIC Code: 2822 and 3357 County Location: Tippecanoe

County Status: Attainment for all criteria pollutants

Source Status: Minor Source, under PSD

Minor Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) natural gas-fired boiler, referred to as the Clayton Steam Boiler, with a maximum heat input capacity of 12.88 Btu per hour. This boiler was installed in 1996 and it exhausts to the atmosphere via stack C-S:
- (b) One (1) natural gas-fired boiler, referred to as the Clever Brooks boiler, with a maximum heat input capacity of 33.48 million Btu per hour. This boiler was installed in 1994 and it exhausts to the atmosphere via stack CB-S;
- (c) One (1) natural gas-fired boiler, referred to as the Clayton Steam Generator, with a maximum heat input capacity of 2.34 million Btu per hour. This boiler was installed in 1980 and it exhausts to the atmosphere via stack CS-S;
- One (1) natural gas-fired boiler, referred to as the Keeler Faber boiler, with a maximum heat input capacity of 25.75 million Btu per hour. This boiler was installed in 1972 and it exhausts to the atmosphere via stack KF-S;
- (e) Natural gas-fired space heaters with a total heat input capacity of 4.005 million Btu per hour;
- (f) Four (4) Banbury mixers, one with a maximum capacity of 2,000 pounds of rubber per hour, and three others each with a maximum capacity of 2,500 pounds of rubber per hour, referred to as BB1 through BB4. The particulate matter emissions from these mixers are controlled by two baghouses;
- (g) Two (2) Continuous Vulcanization Catenary Lines, referred to as CV-1 and CV-2, each with a maximum capacity of 762 pounds of rubber per hour;
- (h) Two (2) continuous vulcanization slope lines, referred to as CV-5 and CV-6, each with a maximum capacity of 762 pounds of rubber per hour;

Notice-Only Change 157-15428-00034 Modified by: ERG/AR

Page 5 of 23 157-14304-00034

- (i) One (1) rod mill;
- (j) Three (3) wire mills;
- (k) One (1) compactor for crushing empty boxes and bags;
- (I) One (1) bag baler;
- (m) Four (4) parts washers;
- (n) One (1) finished goods warehouse;
- (o) Raw material storage areas;
- (p) Electronic beam facility;
- (q) Off-line packaging;
- (r) Waste accumulation area;
- (s) Pilot plant;
- (t) Wastewater evaporator;
- (u) Ancillary equipment;
- (v) Empty compound tanks; and
- (w) Process oil tanks.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of operating permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 Permit Term [326 IAC 2-6.1-7]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications or amendments of this permit do not affect the expiration.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

- C.1 Minor Source Status and Part 70 Source Status [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-7]
 - (a) The total source potential to emit of all criteria pollutants is less than 100 tons per year. Therefore the requirements of 326 IAC 2-7 and 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply. The potential to emit a single HAP is less than 10 tons per year and the potential to emit is less than 25 tons per year for a combination of HAPs. Therefore, 326 IAC 2-7 (Part 70) does not apply.
 - (b) Any change or modification which may increase potential to emit to 100 tons per year from this source for all criteria pollutants except particulate matter (PM), shall cause this source to be considered a major source under 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change. Also, any change or modification which may increase the potential to emit to 250 tons per year of PM shall cause this source to be considered a major source under PSD 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change. Also any change or modification which may increase the potential to emit of a single HAP to greater than ten tons per year and/or a combination of HAPs to be greater than 25 tons per year, shall cause this source to be subject to 326 IAC 2-7 (Part 70). The source shall notify OAQ prior to making the changes.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions:
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

> Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

Testing Requirements

C.9 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

- C.12 Compliance Response Plan Preparation, Implementation, Records, and Reports [326 IAC 1-6]
 - (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
 - (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (1) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (2) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (3) Failure to take reasonable response steps shall constitute a violation of the permit.
 - (c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Record Keeping and Reporting Requirements

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality(OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

Notice-Only Change 157-15428-00034 Page 12 of 23 Modified by: ERG/AR 157-14304-00034

Essex Group, Inc. Lafayette, Indiana Permit Reviewer: ERG/AR

C.14 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.15 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;

- (3) All calibration and maintenance records:
- (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C -Compliance Response Plan Preparation, Implementation, Records, and Reports, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.17 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality Indiana Department of Environmental Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, IN 46206-6015 Notice-Only Change 157-15428-00034 Modified by: ERG/AR

Essex Group, Inc.

Lafayette, Indiana

Permit Reviewer: ERG/AR

Page 14 of 23 157-14304-00034

The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or (d) before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6]:

- (a) One (1) natural gas-fired boiler, referred to as the Clayton Steam Boiler, with a maximum heat input capacity of 12.88 Btu per hour. This boiler was installed in 1996 and it exhausts to the atmosphere via stack C-S;
- (b) One (1) natural gas-fired boiler, referred to as the Clever Brooks boiler, with a maximum heat input capacity of 33.48 million Btu per hour. This boiler was installed in 1994 and it exhausts to the atmosphere via stack CB-S;
- (c) One (1) natural gas-fired boiler, referred to as the Clayton Steam Generator, with a maximum heat input capacity of 2.34 million Btu per hour. This boiler was installed in 1980 and it exhausts to the atmosphere via stack CS-S;
- (d) One (1) natural gas-fired boiler, referred to as the Keeler Faber boiler, with a maximum heat input capacity of 25.75 million Btu per hour. This boiler was installed in 1972 and it exhausts to the atmosphere via stack KF-S;
- (e) Natural gas-fired space heaters with a total heat input capacity of 4.005 million Btu per hour;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the Keeler Faber Boiler and the Clayton Steam Generator shall each be limited to 0.6 pounds of PM per million British thermal units.

D.1.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the Clever Brooks Boiler and the Clayton Steam Boiler shall be limited to 0.37 and 0.36 pounds of PM per million British thermal units, respectively.

The limits were calculated using the equation below:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input: and

Q = Total source maximum operating capacity (MMBtu/hr) = 62 MMBtu/hr for the Clever Brooks boiler and 74 MMBtu/hr for the Clayton Steam boiler.

D.1.3 Particulate Matter [40 CFR 60, Subpart Dc] [326 IAC 12]

The Clayton Steam Boiler and the Clever Brooks boiler are subject to the New Source Performance Standard (NSPS), 326 IAC 12, 40 CFR Part 60 Subpart Dc. Pursuant to this rule, records shall be kept of the amount of fuel combusted during each month. These records shall be maintained by the owner or operator of the facility for a period of two years following the date of such record.

D.1.4 General Provision Relating to NSPS [326 IAC 12-1][40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart Dc.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain monthly fuel records.
- (b) A certification signed by the owner or operator that the records of the fuel usage represent all of the fuel combusted during the period. The natural gas fired boiler certification does not require the certification of the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

The Permittee shall submit a signed certification that certifies that only natural gas was combusted in the Clayton Steam Boiler, Clever Brooks Boiler, and the Keeler Faber Boiler during the period. The natural gas boiler certification shall be submitted semi annually to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6]:

- (f) Four (4) Banbury mixers, one with a maximum capacity of 2,000 pounds of rubber per hour, and three others each with a maximum capacity of 2,500 pounds of rubber per hour, referred to as BB1 through BB4. The particulate matter emissions from these mixers are controlled by two baghouses;
- (g) Two (2) Continuous Vulcanization Catenary Lines 1, referred to as CV-1 and CV-2, each with a maximum capacity of 762 pounds of rubber per hour;
- (h) Two (2) continuous vulcanization slope lines, referred to as CV-5 and CV-6, each with a maximum capacity of 762 pounds of rubber per hour;
- (i) One (1) rod mill;
- (j) Three (3) wire mills;
- (k) One (1) compactor for crushing empty boxes and bags;
- (I) One (1) bag baler;
- (m) Four (4) parts washers;
- (n) One (1) finished goods warehouse;
- (o) Raw material storage areas;
- (p) Electronic beam facility;
- (q) Off-line packaging;
- (r) Waste accumulation area;
- (s) Pilot plant;
- (t) Wastewater evaporator;
- (u) Ancillary equipment;
- (v) Empty compound tanks; and
- (w) Process oil tanks.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (Process Operations), the following conditions shall apply:

(a) The allowable PM emission rate from the Banbury Mixer BB1 shall not exceed 4.1 pounds per hour when operating at a process weight rate of 2000 pounds per hour.

- (b) The allowable PM emission rate from the Banbury Mixers BB2 through BB4 shall each not exceed 4.8 pounds per hour when operating at a process weight rate of 2500 pounds per hour. The baghouses shall be in operation at all times the Banbury Mixers are in operation, in order to comply with this limit.
- (c) The allowable PM emission rate from the continuous vulcanization lines shall each not exceed 2.1 pounds per hour when operating at a process weight rate of 762 pounds per hour.
- (d) The allowable PM emission rate from the thermoplastic extrusion lines shall each not exceed 1.8 pounds per hour when operating at a process weight rate of 588 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.2.2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a emissions unit for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.3 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser emissions unit shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a emissions unit for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two

- (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage emissions unit must be internal such that articles are enclosed under the cover while draining. The drainage emissions unit may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning emissions unit shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY Compliance Branch

MINOR SOURCE OPERATING PERMIT ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Essex Group, Inc.
Address:	3400 Union Street
City:	Lafayette, Indiana 47904
Phone #:	219-461-4000
MSOP #:	157-14304-00034

I hereby certify that Essex Group Inc. is 9 still in operation.

9 no longer in operation.

I hereby certify that Essex Group Inc. is 9 in compliance with the requirements of MSOP 157-14304-00034.

9 not in compliance with the requirements of MSOP 157-14304-00034.

Authorized Individual (typed):	
Title:	
Signature:	
Date:	

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:		

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

MINOR SOURCE OPERATING PERMIT (MSOP) NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Essex Group, Inc.

Source Address: 3400 Union Street, Lafayette, Indiana 47903 **Mailing Address:** 3400 Union Street, Lafayette, Indiana 47903

FESOP No.: 157-14304-00034

FESOP NO	137-14304-00034				
This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.					
Report period Beginning: Ending:					
Boiler Affected	<u>Alternate Fuel</u>	Days burning alternate fuel From <u>To</u>			
	on information and belief forme ument are true, accurate, and co	ed after reasonable inquiry, the sta omplete.	itements and		
Signature:					
Printed Name:					
Title/Position:					
Date:					

Attach a signed certification to complete this report.

*SEE PAGE 2

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-5967

				ĺ
	e used to report malfunction under the used to report malfunction under the exemption under the use of the use		26 IAC 1-6	
THIS FACILITY MEETS THE APPLICABILIT PARTICULATE MATTER?, 25 TONS// 25 TONS// EAR VOC?, 25 TONS// EAR REDUCED SULFU CARBON MONOXIDE?, 10 TONS// ECOMBINATION HAZARDOUS AIR POLLUT, ELEMENTAL LEAD?, OR IS A SOUR MALFUNCTIONING CONTROL EQUIPMEN APPLICABLE LIMITATION	YEAR SULFUR DIOXIDE? AR HYDROGEN SULFIDE? JR COMPOUNDS?, 2 EAR ANY SINGLE HAZARDO ANT?, 1 TON/YEAR CE LISTED UNDER 326 IA	2 TONS/YEAR I 2 TONS/YEAR TONS/YEAR TO 25 TONS/YEAR FLUORIDOUS AIR POLLUTANT? LEAD OR LEAD COMPORTS OF TONS OF T	NITROGEN OXIDE TOTAL REDUCED : DES ?, 100TO , 25 TONS/YE UNDS MEASURED SSIONS FROM	S?, SULFUR DNS/YEAR EAR ANY
THIS MALFUNCTION RESULTED IN A VIOL PERMIT LIMIT OF	LATION OF: 326 IAC	OR, PERMIT CONDITI	ION # AN	D/OR
THIS INCIDENT MEETS THE DEFINITION (OF 'MALFUNCTION' AS LIS	TED ON REVERSE SIDE	:? Y N	
THIS MALFUNCTION IS OR WILL BE LONG	GER THAN THE ONE (1) HO	OUR REPORTING REQUI	REMENT? Y	N
COMPANY:		PHONE NO. ()	
COMPANY:LOCATION: (CITY AND COUNTY)AFS PLAN				
PERMIT NOAFS PLAN CONTROL/PROCESS DEVICE WHICH MALF	T ID: UNCTIONED AND REASO	AFS POINT ID: N:	INSP:_	
DATE/TIME MALFUNCTION STARTED:	// 20			AM / PM
ESTIMATED HOURS OF OPERATION WITH	MALFUNCTION CONDITIO	N:		
DATE/TIME CONTROL EQUIPMENT BACK	-IN SERVICE/_	_/ 20	AM/PM	
TYPE OF POLLUTANTS EMITTED: TSP, P	M-10, SO2, VOC, OTHE	ER:		
ESTIMATED AMOUNT OF POLLUTANT EMIT	TED DURING MALFUNCTI	ON:		
MEASURES TAKEN TO MINIMIZE EMISSION	JS:			
REASONS WHY FACILITY CANNOT BE SHU	ITDOWN DURING REPAIR	 S:		
CONTINUED OPERATION REQUIRED TO PR	ROVIDE ESSENTIAL* SERV	/ICES:		
CONTINUED OPERATION NECESSARY TO CONTINUED OPERATION NECESSARY TO INTERIM CONTROL MEASURES: (IF APPLIC	PREVENT INJURY TO PER PREVENT SEVERE DAMA	SONS:		
MALFUNCTION REPORTED BY:		TITLE:		
(SI	GNATURE IF FAXED)			
MALEUNCTION RECORDED BY:	DATE:	TIME:		

Notice-Only Change 157-15428-00034 Modified by: ERG/AR

Essex Group, Inc. Lafayette, Indiana Permit Reviewer: ERG/AR

Page 23 of 23 157-14304-00034

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

This rule applies to the owner or operator of any facility required to obtain a Sec. 1. permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

*Essential services are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale: